



JACOBS P.C.
NEW YORK BUSINESS ATTORNEYS

Leo Jacobs
Jacobs P.C.
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June 7, 2022

Via ECF and email (beckerman.chambers@nysb.uscourts.gov)

The Honorable Lisa G. Beckerman
United States Bankruptcy Judge
One Bowling Green
New York, NY 10004

Re: In re: JGR Group, Inc. (Case No. 22-10710)

Dear Judge Beckerman:

Jacobs P.C. represents the Debtor JGR Group, Inc. in the above-referenced case.

On June 3, JGR filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.

On the same day, we sent a fax to Chase Bank notifying it that the continued prohibition of transfers from certain of the Debtor's bank accounts would constitute a violation of the automatic stay. We therefore requested that the bank unrestrain the Debtor's accounts. A copy of that request accompanies this letter.

The bank continued to restrain the accounts as of Monday, June 6, 2022. The Debtors therefore opened new Debtor in Possession accounts at TD Bank and attempted to close the accounts at Chase Bank. Chase would not allow this.

We therefore reached out to Paula Colbath, opposing counsel in the state court litigation that led to the restraints on the Debtor's accounts, informing her that continued account restraints constitutes a violation of the automatic stay, and she should direct Chase to unrestrain the accounts. Ms. Colbath did not do so—the Debtor has been in touch with Irina Aronova, a Chase Bank Relationship Manager, who confirmed that Ms. Colbath has not so directed the bank.

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The Debtor is behind on operating expenses because it cannot access these accounts. As such, we request that the Court set a telephonic conference on the record on an emergency basis in order for the Debtor to successfully administer its duties under chapter 11.

Respectfully submitted,

/s/Leo Jacobs
Leo Jacobs

CC: Paula Colbath, Esq. (via email)
Wayne Greenwald, Esq. (via email)



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June 3, 2022

Via FAX

Chase Legal / Court Orders Department
Fax: (866) 699-0618

Re: Mary Hartline v. Gennadiy Sadykov et al (Index No.: 56989/2020)
Case # 569892020
Internal # COAL-20MAY22-1865

To Whom It May Concern:

Jacobs PC represents the Defendants (Gennadiy Sadykov and JGR Group, Inc., d/b/a KS Renovation Group ("JGR")) in the above-referenced case.

Today, June 3, JGR filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code. Notice of that filing accompanies this letter.

We understand that the NY State Supreme Court issued an injunction in the above-referenced action. That injunction prohibited certain transfers of JGR's accounts:

JGR Group Inc. d/b/a KS Renovation Group
##7732: \$55,000
##1303: \$453,715
##8603: \$1,058,558

Pursuant to Bankruptcy Code section 362(a) JGR's filing of a bankruptcy petition acts as an automatic stay against:

- (1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title;
- (2) the enforcement, against the debtor or against property of the estate, of a judgment obtained before the commencement of the case under this title;

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(3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate; . . .

(6) any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title . . .

Accordingly, Chase Bank's continuing restraint on JGR's funds is a violation of the automatic stay. Accordingly, **WE ASK THE BANK UNRESTRAIN JGR'S ACCOUNTS.**

Please contact the undersigned if there are any questions in this regard.

Respectfully submitted,

/s/Leo Jacobs
Leo Jacobs

I, Gennadiy Sadikov, authorize Leo Jacobs to make the above request. He is my attorney for this matter.

/s/Gennadiy Sadykov
Gennadiy Sadykov

CC: Paula Colbath, Esq. (via email)
Wayne Greenwald, Esq. (via email)

6/7/22, 1:08 PM

New York Southern Live System

United States Bankruptcy Court
Southern District of New York

Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 06/03/2022 at 8:28 PM and filed on 06/03/2022.

JGR Group, Inc.
9-19 38 Avenue
Long Island City, NY 11101
Tax ID / EIN: 83-2326681
dba KS Renovation Group



The case was filed by the debtor's attorney:

Ilevu Yakubov
Jacobs PC
450 Lexington Ave
New York, NY 10017
718-772-8704

The case was assigned case number 22-10710-lgb to Judge Lisa G Beckerman.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <http://ecf.nysb.uscourts.gov> or at the Clerk's Office, One Bowling Green, New York, NY 10004-1408.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Vito Genna
Clerk, U.S. Bankruptcy Court

PACER Service Center
Transaction Receipt
06/07/2022 13:08:55

6/7/22, 1:08 PM

New York Southern Live System

PACER Login:	iyakubov09	Client Code:	
Description:	Notice of Filing	Search Criteria:	22-10710-lgb
Billable Pages:	1	Cost:	0.10

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Southern District of New York (State)

Case number (if known): Chapter 11

☐ Check if this is an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

04/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name JGR Group, Inc.

2. All other names debtor used in the last 8 years KS Renovation Group

Include any assumed names, trade names, and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 83-2326681

4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	9-19 38 Avenue Number Street	Number Street
		P.O. Box
	Long Island City, NY 11101 City State ZIP Code	City State ZIP Code
	Queens County	Location of principal assets, if different from principal place of business
		Number Street
		City State ZIP Code

5. Debtor's website (URL) www.ksrenovation.com

Debtor JGR Group, Inc. Case number (if known)
Name

6. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other. Specify: _____

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply:

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

2361 _ _ _

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☒ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

☒ No

- ☐ Yes. District _____ When _____ Case number _____
MM / DD / YYYY
District _____ When _____ Case number _____
MM / DD / YYYY

If more than 2 cases, attach a separate list.

Debtor JGR Group, Inc. Case number (if known) _____
 Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

List all cases. If more than 1, attach a separate list.

☒ No

☐ Yes. Debtor _____ Relationship _____
 District _____ When _____
 Case number, if known _____ MM / DD / YYYY

11. Why is the case filed in *this* district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
 What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____

Where is the property? _____

Number Street

City

State ZIP Code

Is the property insured?

☐ No

☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5,001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

Debtor JGR Group, Inc. Case number (if known)
Name

15. Estimated assets

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000 | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

16. Estimated liabilities

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000 | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

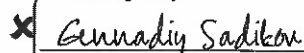
I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 06/03/2022

DocuSigned by: MM / DD / YYYY



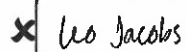
Signature of authorized representative of debtor

Gennadiy Sadykov
Printed name

Title President

18. Signature of attorney

DocuSigned by:



Signature of attorney for debtor

Date 06/03/2022
MM / DD / YYYY

Leo Jacobs
Printed name

Jacobs PC
Firm name

450 Lexington Avenue, 4th Floor
Number Street

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City State ZIP Code

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Bar number

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